

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

Santana Bryson and Joshua Bryson, as
Administrators of the Estate of C.Z.B.,
and as surviving parents of C.Z.B., a
deceased minor,

Plaintiffs,

v.

Rough Country, LLC,

Defendant.

Civil Action File

No. 2:22-CV-017-RWS

**DEFENDANT’S NOTICE OF CORRECTION AND
CLARIFICATION REGARDING ITS RESPONSE
TO PLAINTIFFS’ MOTION TO STRIKE THE
UNTIMELY AND IMPROPER SUR-REBUTTAL
REPORT OF WESLEY GRIMES**

On February 12, 2025, Defendant Rough Country, through its counsel, filed its Response to Plaintiffs’ Motion to Strike the Untimely and Improper Sur-Rebuttal Report of Wesley Grimes (Doc. 126). Because that Response contained an error as to when Plaintiffs first tendered Mr. Buchner’s amended HVE case files, Rough Country files this Notice of Correction and Clarification.

Specifically, in the Response, Rough Country states that Plaintiffs did not produce Mr. Buchner’s amended HVE simulations until June 19, 2024. (See Doc. 126, at 8 and 11.) This statement is incorrect because Plaintiffs included digital HVE

files from Mr. Buchner's amended HVE simulations when they produced Mr. Buchner's Amended Report on May 8, 2024.

Rough Country's counsel was confused because it appears that Mr. Buchner's amended HVE simulations were subsequently produced a second time on or about June 17, 2024, and this was the data set that Mr. Grimes ultimately used in connection with his analysis. [*See* Doc. 116-4 (Grimes Report), at 3 (Mr. Grimes obtained and reviewed "Bryant Buchner HVE case filed, dated June 19, 2024).]

Rough Country's counsel apologizes for any confusion that this inadvertent error may have caused.

This, the 18th day of February, 2025.

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/s/ Aaron Chausmer

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RULE 7.1D CERTIFICATE OF TYPE, FORMAT AND FONT SIZE

Pursuant to Local Rule 7.1D of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court complies with Local Rule 5.1 in that it was computer-processed, double-spaced between lines, and used Times New Roman font of 14 point size.

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CERTIFICATE OF SERVICE

This is to certify that I have electronically served the foregoing filing with the Clerk of Court via CM/ECF, which will send a copy to the following attorneys of record:

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Robert H. Snyder, Jr.
Devin Mashman
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ATTORNEYS FOR PLAINTIFFS

This 18th day of February, 2025.

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/s/ Aaron Chausmer

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